

VCS PROJECT REVIEW REPORT

Project ID	138
Project Name	Greater New Bedford LFG Utilization Project
Project Proponent	CommonWealth Resource Management Corporation
Methodology	ACM0001, "Large-scale Consolidated Methodology – Flaring or use of landfill gas", Version 16
Sectoral Scope(s)	1. Energy (renewable/non-renewable)
Validation/Verification Body (VVB)	Ruby Canyon Engineering, Inc.
Registry	Markit

Assessment Criteria	VCS Standard v3.7, ACM0001, "Large-scale Consolidated Methodology – Flaring or use of landfill gas", Version 16
Date of First Issue	3 April 2018
Date of Final Issue	25 April 2018

Summary:

An accuracy review of the Greater New Bedford LFG Utilization Project issuance request has been conducted by VCS in accordance with Section 4.3 of the *Registration and Issuance Process*.

The accuracy review has raised 1 assessment findings and no minor findings, detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment findings presented in Section 1. The 1 assessment finding must be addressed to the satisfaction of VCS.

This findings report may be made publically available. Confidential information may be provided as separate attachments.

1 ASSESSMENT FINDINGS

Finding 1

Section 4.1 of the VCS *Verification Report Template, v3.4* requires the VVB to describe the steps taken to assess whether the project has received or sought any other form of environmental credit.

Section 1.9 of the monitoring report describes how the project produces Renewable Energy Credits (RECs) that do not include the GHG emission reduction attributes associated with the destruction of methane.

Section 4.1 of the verification report states that the emission reduction credits associated with the project are only registered with the VCS Program, but does not speak to how the VVB assessed the project proponent's claims with respect to the RECs generated by the project. The VVB is requested, in describing the steps taken to assess whether the project has received any other form of environmental credit, to clarify whether the VVB concurs with the project proponent's assertion that the RECs are generated from an activity not included in the scope of the GHG project.

VVB Response:

The methodology allows for emissions reductions to be generated for the destruction of methane emissions and for the displacement of a more GHG-intensive service (e.g. electricity or heat). This project is claiming emissions reductions only for the destruction of methane. The project does also claim RECs from renewable electricity generation, but the generation of electricity is outside the defined project boundary according to the validated Project Description. Thus, although the methodology allows for emissions reductions from electricity generation and displacement of more GHG-intensive electricity, the project is choosing to claim RECs associated with the renewable electricity—rather than emissions reductions—under another program and independent of VCS. RCE's assessment of whether the project received any other form of environmental credit included the following steps:

- RCE searched other carbon registries for listing of this same project and found that the project last registered vintage 2008 credits with American Carbon Registry;
- RCE reviewed the Project Description which states that emissions reductions from electricity displacement are excluded, and electricity generation is outside the project boundary;
- RCE reviewed the project boundary and the RECs generated independently of the VCS project in detail with the project proponent; and
- RCE verified that the calculation of emissions reductions includes only destruction of methane.

RCE agrees with the project proponent's assertion that the RECs are generated from an activity not included in the scope of the project.

VCS Response:

The VVB has clarified that it concurs with the project proponent's assertion that the RECs are generated from an activity not included in the scope of the GHG project.

Considering the above, this finding is closed and no further action is required.

2 MINOR FINDINGS

N/A

3 ASSESSMENT CONCLUSION

On 3 April 2018, Verra delivered to Ruby Canyon Engineering, Inc. this project review report.

On 11 April 2018, Ruby Canyon Engineering, Inc. submitted responses to Finding 1 in this project review report.

On 25 April 2018, Verra closed Finding 1 and no further action was required.